

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WILSON DIVISION**

**IN RE:
WYKESHIA DELOATCH
DEBTOR**

**CASE NO.:
11-07324-8-RDD
CHAPTER 13**

AMENDED MOTION TO MODIFY CHAPTER 13 PLAN

NOW COMES the above named debtor by and through the undersigned counsel and hereby moves the Court to modify the Chapter 13 Plan to surrender the 2003 Nissan Xterra to Auto Loans. Trustee should be directed to stop any and all distribution to Auto Loans on said claim. The Debtor's plan should be modified to \$255.00 for 23 months and \$50 for 13 months beginning in August, 2013.

WHEREFORE, the debtor hereby requests that her Chapter 13 Plan be amended and modified as set forth above.

This the 28th day of August, 2013.

SOSNA LAW OFFICES

By: s/Michael B. Sosna
Michael B. Sosna
Attorney for Debtor
3210 Zebulon Road
Rocky Mount, NC 27804
(252) 937-3027
NC Bar No.: 8596

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NOTICE OF MOTION TO MODIFY PLAN

Debtor has filed papers with the court to modify her Chapter 13 Plan.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in motion, or if you want the court to consider your views on the motion, then on or before September 23, 2013, unless otherwise ordered, you or your attorney must file with the court, pursuant to Local Rule 9013-1 and 9014-1, a written response, an answer explaining your position, and a request for hearing at:

U.S. Bankruptcy Court
1760-A Parkwood Blvd
Wilson, NC 27893

If you mail your response to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

You must also mail a copy to:

Michael B. Sosna
Attorney for Plaintiff
1701 Sunset Avenue, Suite 207
Rocky Mount, North Carolina 27804

Richard M. Stearns
1015 Conference Drive
Greenville, NC 27858

If a response and a request for hearing is filed in writing on or before the date set above, a hearing will be conducted on the motion at a date, time and place to be later set and all parties will be notified accordingly.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

This the 28th day of August, 2013.

SOSNA LAW OFFICE

s/Michael B. Sosna
MICHAEL B. SOSNA
Attorney for Debtors
3210 Zebulon Road
Rocky Mount, North Carolina 27804
Telephone: (252) 937-3027
NC Bar No. 8596

CERTIFICATE OF SERVICE

I, Kimberly D. Summerlin, for Sosna Law Office, Michael B. Sosna, 3210 Zebulon Road, Rocky Mount, NC 27802, certify:

That I am, and at all times hereinafter mentioned was, more than eighteen (18) years of age:

That on August 28, 2013, I mailed a copy of the foregoing Motion to Modify, by depositing copies thereof in the United States mail, first class mail, postage prepaid, in an envelope addressed as shown below.

I certify under penalty of perjury that the foregoing is true and correct.

Dated: August 28, 2013

s/Kimberly D. Summerlin
Kimberly D. Summerlin
Sosna Law Offices
3210 Zebulon Road
Rocky Mount, NC 27804
(252) 937-3027

SERVED ON:

Auto Loans
Attention: Officer/Managing Agent
45 Haverhaul Road
Andover, MA 01810

Wykeshia Deloatch
305C Field Drive
Conway, NC 27820

Richard M. Stearns
Chapter 13 Trustee
1015 Conference Drive
Greenville, NC 27858

Label Matrix for local noticing
0417-8
Case 11-07324-8-RDD
Eastern District of North Carolina
Wilson
Wed Aug 28 10:28:45 EDT 2013

(p)FARMERS FURNITURE
ATTN CORPORATE CREDIT DEPT
PO BOX 1140
DUBLIN GA 31040-1140

Lease & Rental Management Corp dba Auto Loan
45 Haverhill Street
Andover, MA 01810-1414

U. S. Bankruptcy Court
1760 A Parkwood Blvd.
Wilson, NC 27893-3588

Aarons Sales & Lease
112 Cardinal Drive
Roanoke Rapids, NC 27870-4946

Auto Loans
45 Haverhill Road
Andover, MA 01810-1499

Cornerstone Partners
PO Box 3023
327 W. 4th Street
Temple, TX 76504

Jefferson Capital Systems LLC
PO BOX 7999
SAINT CLOUD MN 56302-7999

Lease and Rental Management Corp. d/b/a Auto
Auto Loan
45 Haverhill Street
Andover, MA 01810-1499

RJM Acquisitions
575 Underhill Blvd. Ste. 224
Syosset, NY 11791-4437

SSM Group, LLC
PO Box 3023
327 W. 4th Street
Hutchinson, KS 67501-4842

St. Armands
300 Madison Drive
Sarasota, FL 34236-1300

St. Augustines College
PO Box 27481
Raleigh, NC 27611-7481

Michael B. Sosna
Sosna Law Offices
3210 Zebulon Road
Rocky Mount, NC 27804-2435

Richard M Stearns
1015 Conference Drive
Greenville, NC 27858-5969

Wykeshia R. Deloatch
305C Field Drive
Conway, NC 27820-9740

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Farmers Furniture
Attn: Corporate Credit
PO Box 1140
Dublin, GA 31040-1140

(d)Farmers Furniture
1182 Julian Allsbrook Rd.
Roanoke Rapids, NC 27870

(d)Farmers Furniture
Attn: Corporate Credit
PO Box 1140
Dublin, GA 31040

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)500 Fash Cash

(d)Rjm Acquisitions Llc
575 Underhill Blvd
Suite 224
Syosset, NY 11791-4437

End of Label Matrix
Mailable recipients 15
Bypassed recipients 2
Total 17